

# **EXHIBIT D**

**From:** [Geman, Rachel](#)  
**To:** [Burgoon, Emma Z.](#)  
**Cc:** [OpenAICopyright](#); [#C-M.OPENAI.COPYRIGHT.LITIGATION-IW.TEAM](#); [KVP-OAI](#); [ahurst@orrick.com](#); [jared.briant@faegredrinker.com](#); [lnajemy@orrick.com](#); [ccariello@orrick.com](#); [djustice@orrick.com](#)  
**Subject:** Re: [EXT] Authors Guild - Maya Lang  
**Date:** Tuesday, June 11, 2024 9:59:00 AM  
**Attachments:** [image001.png](#)

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We do not agree to absent class member discovery.  
Sent from my iPhone

On Jun 11, 2024, at 11:40 AM, Burgoon, Emma Z. <EBurgoon@mofo.com> wrote:

Rachel,

OpenAI does not oppose the withdrawal of Maya Lang as a named plaintiff, so long as you agree that her withdrawal will not affect our ability to obtain discovery from her.

Thanks,

Emma

Emma Z. Burgoon (she/her/hers)  
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<image001.png>

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